

# EXHIBIT D

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

PAUL WILLIAMS-ISRAEL, Individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL  
ROBERTS, WILLIAM ROBERTS, and  
BELINDA NUCIFORA,

Defendants.

Case No. 1:24-cv-07046-PK

**DECLARATION OF SANDRA MALETTA IN SUPPORT OF HER MOTION FOR  
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

I, Sandra Maletta, pursuant to 28 U.S.C. § 1746, hereby declares as follows:

1. I respectfully submit this Declaration in Support of my Motion for: Appointment as Lead Plaintiff and Approval of Lead Counsel in the instant class action on behalf of investors in Iris Energy Limited (“IREN,” “Iris Energy,” or the “Company”) securities pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”). I am informed of and understand the requirements and duties imposed by the PSLRA.

2. I am a citizen of Canada and reside in St. Catharines, Ontario.

3. I graduated from the University of Toronto with a bachelor’s degree in science.

4. I am retired.

5. I have been investing in the stock market for 30 years and manage my own investments.

6. I believe the securities class action against defendants Iris Energy, Daniel Roberts, William Roberts, and Belinda Nucifora is meritorious and should be led by an investor who is committed to maximizing the recovery on behalf of the class. I traded in IREN securities during the Class Period and suffered a substantial loss as a result of the violations of the federal securities laws alleged in this Action. I am motivated to recover my losses for my benefit and the benefit of all members of the Class. It is for this reason that I decided to seek appointment as Lead Plaintiff in the action. I understand the responsibilities and duties of being Lead Plaintiff, including my fiduciary duties to the class.

7. I understand and appreciate a Lead Plaintiff’s obligation under the PSLRA to select lead counsel and to monitor the actions of counsel to ensure the action is prosecuted efficiently. I have fulfilled this responsibility by selecting and retaining counsel with a proven history of handling this type of complex litigation. In this case, I have selected Faruqi & Faruqi,

LLP (the “Faruqi Firm”) to serve as lead counsel. Based on the firm’s experience in achieving substantial recoveries in securities class actions, I believe the Faruqi Firm is well qualified to represent the class. As part of my due diligence process, prior to our selection of the Faruqi Firm, I assessed the firm’s qualifications and communicated with Robert Killorin, a partner at the Faruqi Firm about the case and duties and role of a lead plaintiff.

8. I have directed the Faruqi Firm to prosecute this action in an efficient, cost-effective manner while obtaining the best possible result for the class. I will continue to supervise lead counsel and actively oversee the prosecution of this action for the benefit of the class by, among other things, reviewing pleadings, instructing counsel, and/or attending hearings, as necessary.

9. I understand that a Lead Plaintiff’s share of any recovery is the same as every other potential class member. As my certificate states, I will not accept any payment for serving as a representative party beyond my *pro rata* share, except any reasonable costs and expenses – such as lost wages and travel expenses – directly related to the class representation, as ordered or approved by the Court pursuant to the PSLRA.

I, Sandra Maletta, declare under penalty of perjury that the foregoing is true and correct.

Dated: 12/06/2024

Sandra Maletta  
Sandra Maletta (Dec 6, 2024 15:57 EST)  
Sandra Maletta